

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY, NEWARK DIVISION

ISRAEL ALBERT ALMEIDA and)	
MICHAEL R. TUMMINELLI)	
)	Case No. 2:16-cv-03411-KM-JBC
Plaintiffs,)	
)	
v.)	NOTICE OF MOTION
)	
THE HON. N. PETER CONFORTI, et al.)	ORAL ARGUMENT REQUESTED
)	
)	
Defendants.)	
)	

NOTICE OF MOTION FOR PRELIMINARY INJUNCTION

PLEASE TAKE NOTICE that ISRAEL ALBERT ALMEIDA and MICHAEL R. TUMMINELLI (“Plaintiffs”) will move before the Honorable Kevin McNulty, U.S.D.J, on August 1, 2016 for an Order granting Plaintiffs’ relief sought in Plaintiffs’ Motion for Preliminary Injunction.

In support of said Motion, Plaintiffs rely on the following:

1. Plaintiffs’ Memorandum in Support of Their Motion for Preliminary Injunction;
2. Plaintiffs’ Verified Complaint for Declaratory and Injunctive Relief, including exhibits;
3. Exhibit “A” attached hereto; and

4. Oral argument if allowed by this Court.

This, the 1st day of July, 2016.

Respectfully submitted,

/s/ Ryan S. Watson
RYAN S. WATSON

Of Counsel:

Ryan S. Watson
Law Offices of J. Scott Watson, P.C.
24 Regency Plaza
Glen Mills, PA 19342
(610) 358-9600
NJ Bar No. 089642013
ryan.watson@jscottwatson.com

Stephen D. Stamboulieh
Stamboulieh Law, PLLC
P.O. Box 4008
Madison, MS 39130
(601) 852-3440
stephen@sdsllaw.us
MS Bar No. 102784
*Admitted Pro Hac Vice

Alan Alexander Beck
Law Office of Alan Beck
4780 Governor Drive
San Diego, CA 92122
(619) 905-9105
Alan.alexander.beck@gmail.com
*Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on July 1st, 2016, I electronically filed the foregoing document or pleading using the CM/ECF system which generated a NEF for all counsel of record.

I hereby certify that the following non-CM/ECF participants were served a copy of the foregoing document or pleading by United States Postal Service, postage prepaid:

Honorable Carmen Alvarez
Superior Court, Appellate Division
P.O. Box 280
Cape May Court House, NJ 08210-0280

Shaina Brenner
Sussex County Prosecutor's Office
1921 High Street
Newton, NJ 07860

The Honorable Peter Conforti
Superior Court, Criminal Division,
Morris County
Sussex County Courthouse
4437 High Street, 3rd Floor
Newton, NJ 07860

Robert Lougy
Acting Attorney General
25 Market Street
Trenton, NJ 08611

Chief Michael Richards
Newton Police Department
39 Trinity Street
Newton, NJ 07860

Honorable Marie Simonelli
Superior Court, Appellate Division

Leroy F. Smith, Jr. Public Safety
Complex
60 Nelson Place, 8th Floor
Newark, NJ 07102-1501

Sussex County
Office of the County Administrator
One Spring Street
Newton, NJ 07860

By: /s/ Ryan S. Watson
Ryan S. Watson